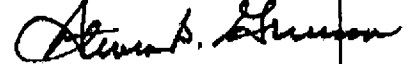


EXHIBIT A

Plaintiff's Complaint

EXHIBIT A

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1 **COMP**
2 **LESLIE MARK STOVALL, ESQ.**
3 Nevada Bar No. 2566
4 **ROSS H. MOYNIHAN, ESQ.**
5 Nevada Bar No. 11848
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CASE NO: A-20-821615-C
Department 27

DISTRICT COURT
CLARK COUNTY, NEVADA

10	TERRI MOORE, an individual,)	
11)	CASE NO.:
12	Plaintiff,)	DEPT NO.:
13	vs.)	
14)	
15	BJ'S RESTAURANT, OPERATIONS)	
16	COMPANY, ROES 1-X,)	
17	and DOE CORPORATIONS I-X, inclusive)	
18)	
19	Defendants.)	

COMPLAINT

20 COMES NOW, Plaintiff, TERRI MOORE, by and through her attorneys, STOVALL &
21 ASSOCIATES, and for his complaint the Defendants, and each of them, alleges and state as
22 follows:

23 I.

24 That plaintiff, TERRI MOORE is, and at all times mentioned herein was, a resident of
25 Las Vegas, Nevada.

26 II.

1 The defendant, BJ'S RESTAURANT, OPERATIONS COMPANY. is, and at all times
2 mentioned herein was, a domestic nonprofit corporation duly authorized and licensed to do
3 business in the state of Nevada.

4
5 III.

6 That the identities and the capacities of the defendants designated herein as DOES I-X or
7 ROE CORPORATIONS I-X, including, but not limited to, individuals, or entities who created or
8 were responsible for the hazardous condition referred to in this complaint, and whose negligence
9 cause plaintiff's fall on September 8, 2018 at the BJ's Restaurant Inc., located at 2888 Evergold
10 Dr., Henderson, Nevada 89047 are presently unknown to plaintiff at this time, who therefore,
11 sues said defendants by such fictitious names and when their true names and capacities are
12 ascertained, plaintiff will amend her complaint accordingly to insert the same herein.

13
14 IV.

15 That at all times mentioned herein, the named defendants, including, but not limited to
16 DOES I-X or ROE CORPORATIONS I-X, were agents, servants, employees or joint ventures of
17 every other defendant named herein, ant at all times mentioned herein were acting within the
18 scope and course of said agency, employment or joint venture with knowledge and permission
19 and consent of all other named defendants whose negligence cause plaintiff's fall on September
20 8, 2018 at the BJ's Restaurant, located at 2888 Evergold Dr., Henderson, Nevada 89047.

21
22 V.

23 That on September 8, 2019 plaintiff, TERRI MOORE, slipped on a wet substance and
24 fell on the floor while walking to the women's restroom at the BJ'S RESTAURANT, located on
25 2888 Evergold Dr., Henderson, Nevada 89047 causing her to suffer severe bodily injuries.

26
27 VI.

1 That the defendants negligently maintained the premises in an unsafe condition to wit: 1)
2 left the wet floor unattended; and 2) failed to give notice of the wet substance on the floor.

3
4 VII.

5 That the defendants knew or should have known that leaving a wet substance on the floor
6 and failing to give notice to that dangerous condition created a hazard to customers walking to
7 the restroom of defendant's restaurant.

8
9 VIII.

10 That as direct and proximate result of the aforementioned negligence of the defendants,
11 plaintiff TERRI MOORE, sustained injuries to her body and limbs, organs and systems, severe
12 pain and suffering some or all of which conditions may be permanent and disabling, all to his
13 damages in a sum in excess of \$ 50,000.

14
15 IX.

16 That as a direct and proximate result of the aforementioned acts of the defendant, plaintiff
17 suffered severe emotional injury, anguish and pain and suffering, all to the plaintiff's damages in
18 a sum in excess of \$ 50,000.

19
20 X.

21 That as a direct and proximate result of the aforementioned acts of the defendant, plaintiff
22 TERRI MOORE, did receive past medical and other treatment for her injuries and said services,
23 care and treatment and continuing and shall continue in the future, all to her damage in a sum in
24 excess of \$ 50,000.

25
26 XI.

1 That the injuries complained of herein, diminish the plaintiff's ability and capacity to
2 engage in activities to the same extent as prior to the accident, which is the subject of this
3 complaint, all to the plaintiff's damages in a sum in excess of \$ 50,000.


4
5 XII.

6 That plaintiff, TERRI MOORE, has been required to engage the services of an attorney
7 incurring attorney fees and cost to bring this action and is entitled to attorney's fees and costs.

8 WHEREFORE, plaintiff, expressly reserving his right to amend this Complaint prior to
9 or at the time of trial of this action to insert those items of damage not yet fully ascertainable,
10 prays judgment against the defendants, and each of them as follows:
11

- 12 1. For general damages and compensatory damages sustained by plaintiff in an
13 amount in excess of \$ 50,000;
- 14 2. For Special damages sustained by plaintiff in an amount in excess of \$ 50,000;
- 15 3. For costs of medical care, treatment and other expenses incurred once they are
16 fully ascertained;
- 17 4. For loss of enjoyment of life when same has been full ascertained;
- 18 5. For reasonable attorney's fees and costs of suit incurred herein according to proof;
- 19 6. For interest at the statutory rate.
20

21 DATED 21 day of September 2020
22

23 
24 LESLIE MARK STOVALL, ESQ.
25 Nevada Bar No. 2566
26 2301 Palomino Lane
27 Las Vegas, Nevada 89107
28 *Attorney for Plaintiff*